

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

*Nelson v. Teva Pharmaceuticals Indust.,  
Ltd., et al.,*

Case No. 2:19-cv-00332-JMA-AKT

**AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF  
PLAINTIFF GERALD NELSON**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Teva Pharmaceuticals USA, Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc. will take the deposition upon oral examination of Gerald Nelson on **February 26, 2021 at 10:00 a.m. EST** at 86 Park Lane Drive, Albertson, New York 11507. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

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Date: January 25, 2021

Respectfully submitted,

/s/ Tiffany M. Andras  
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*Attorneys for Teva Pharmaceuticals USA, Inc.,  
Teva Pharmaceutical Industries Ltd., Actavis LLC,  
and Actavis Pharma, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 25th day of January 2021, I caused a true and correct copy of the Amended Notice of Videotaped Deposition of Plaintiff Gerald Nelson to be filed upon all counsel of record via the Court's ECF system, with copies by e-mail to Counsel for Plaintiff as follows:

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/s/ Tiffany M. Andras  
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